



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 1110950003 - McHenry County
Woodstock/Woodstock Die Casting
ILDC05471503

EPA Region 5 Records Ctr.



350460

COMPLIANCE INQUIRY LETTER

Certified # P 594 558 520

October 4, 1985

Woodstock Die Casting
Attention: Cathy Knapp
555 Wheeler Street
Woodstock, Illinois 60098

Dear Ms. Knapp:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code, Part 725 Subparts B, C, D, E, G, and I and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations.

The Agency's findings of apparent non-compliance listed in Attachment A are based on an inspection completed on August 30, 1985. For your convenience a copy of the inspection report is enclosed with this letter.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations and a description of the steps which have been taken to correct the identified violations. The written response should be sent to the following:

Mark A. Hamey, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

In addition, include in your response two copies of a completed waste analysis plan, a completed inspection schedule, an outline of your personnel training program, and an outline of your operating record.

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.



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If you have any questions regarding the above, please contact Rick Peterson at 312/345-9780.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mark A. Haney".

Mark A. Haney, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Division of Land Pollution Control

MAH:MT:sf/2390e,47-48

cc: Division File ✓
Northern Region
Don Gimbel
Rick Peterson
Michelle Tebrugge



Attachment A

1. Pursuant to 35 Ill. Adm. Code 725.113(b), the owner or operator must have on file at the facility a detailed written waste analysis plan describing the procedures to be used to compile data required under Section 725.113(a). You are in apparent violation of 35 Ill. Adm. Code 725.113(b) since no such plan was present at the site on the date of the inspection.
2. Pursuant to 35 Ill. Adm. Code 725.115(d), the owner or operator must record inspections, and the specific data required by this Section in an inspection log or summary. These records must be kept for at least three years. You are in apparent violation of 35 Ill. Adm. Code 725.115(d) for the following reason(s): At the time of the inspection, there were no documented inspection records.
3. Pursuant to 35 Ill. Adm. Code 725.116(d), the owner or operator must maintain the following documents and records at the facility:
 - 1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
 - 2) A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education or other qualifications and duties of facility personnel assigned to each position;
 - 3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this Section;
 - 4) Records that document that the training or job experience required under paragraphs (a), (b) and (c) of this Section has been given to and completed by facility personnel.

You are in apparent violation of 35 Ill. Adm. Code 725.116(d) in that number(s) 2 and 4 above for all applicable personnel were not maintained at the facility.

4. Pursuant to 35 Ill. Adm. Code 725.173, the owner or operator must keep a written operating record at the facility. The operating record must include the following:
 1. A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I of 35 Ill. Adm. Code 725.173;
 2. The location and quantity of each hazardous waste within the facility including cross-references to specific manifest document numbers;



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3. Records and results of waste analyses and trial tests;
4. Summary reports and details of all incidents that require implementation of the contingency plan;
5. Records and results of inspections;
6. Monitoring, testing and other analytical data;
7. All closure cost estimates and, for disposal facilities, all post-closure cost estimates.

You are in apparent violation of 35 Ill. Adm. Code 725.173 in that the operating record did not include number(s) 1, 2, and 5 above.

MT:sf/2390e,49-50